

Alcan Powders and Pigments

Division of Alcan Aluminum Corporation



901 Lehigh Avenue, Union, New Jersey 07083-0746

Mailing Address: Box 290, Elizabeth, New Jersey 07207-0290. Telephone: 201/353-4600

CERTIFIED RETURN RECEIPT REQUESTED

March 27, 1986

Mr. Frank Coolick, Bureau Chief
Division of Waste Management
NJ Department of Environmental Protection
32 East Hanover Street
Trenton, NJ 08625

Re: Request to de-list Alcan's Union NJ Facility
EPA ID NO. NJD 065 815 771

Dear Mr. Coolick:

Alcan's Powder and Pigments Facility, located at 901 Lehigh Avenue, Union NJ filed Part A application with the Federal EPA in 1980. Subsequently, Alcan received an interim authorization to store hazardous waste on site for longer than 90 days. However, Alcan never did treat its hazardous waste and has always disposed its waste thru and EPA authorized hauler to an EPA authorized disposal facility.

Further review of the recent Hazardous Waste Regulations NJAC 7:26, subchapter 9 et. seq. published by NJ Department of Environmental Protection, indicates that Alcan's plant at Union, NJ Facility can meet all the regulations requirements for NJAC 7:26 - 9.3 for "Accumulation of hazardous waste for 90 days or less".

Alcan supports its request for de-listing as a TSD facility on the following grounds.

1. Alcan at its Union NJ facility stores its hazardous waste in accordance with NJAC 7:26 - 7.2 and manages in accordance with NJAC 7:26 - 9.4 (d) including:
 - a. All hazardous wastes are stored at Union's on-site waste storage area in 55 gallon drums. These drums are properly labelled including the date of accumulation.
 - b. Spent solvents are collected in an above ground horizontal tanks. The tank is located in a dyke for secondary containment.
 - c. All containers are compatible with hazardous waste and the area is managed properly including daily inspection.

THE UNIVERSITY OF CHICAGO
DEPARTMENT OF THE HISTORY OF ARTS
AND ARCHITECTURE
CHICAGO, ILLINOIS 60637

TO THE EDITOR OF THE JOURNAL OF THE
ROYAL ANTHROPOLOGICAL INSTITUTE
LONDON

I have the honor to acknowledge the receipt of your letter of the 10th inst. in relation to the above-mentioned matter.

I am sorry to hear that you have been unable to obtain the necessary information from the authorities concerned.

I am sure that you will be able to obtain the necessary information from the authorities concerned.

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- d. Alcan facility in Union has in place a workable communication system (telephone with remote audio receivers) to contact emergency coordinator in case of fire, explosion or release of any hazardous material.
- e. Local Fire Department has toured Alcan's facility on several occasions and are familiar with Alcan's production activities and type of hazardous waste. A copy of the plan has been sent to Fire Department for their files.
- f. Local hospitals and Police Departments have been appraised of Alcan's hazardous waste management plan.
- g. All hazardous waste storage locations are outside the buildings. The location is such that evacuation to a safe distance from them or from the entire facility can be easily achieved.
- h. Alcan's facility at Union has in place a personnel training program. Training is provided to those who are involved in routine day to day hazardous waste management operations.
- i. Currently Alcan is in the process of working out a contractual agreement with at least two hazardous waste haulers to dispose of all wastes from site before every 85 days of accumulation.

Should you have any questions on the above mentioned justification, please contact me at (201) 353-4600 ext. 261.

Very truly yours,
ALCAN POWDERS & PIGMENTS



S. K. Sethi
Division Project Engineering Manager

SKS:df

cc: Ms. Susan Lin, Environmental Engineer
Compliance and Enforcement Section
US Environmental Protection Agency
Room 1043
26 Federal Plaza
New York, NY 10278

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✓C119= 3
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860716
co. requests reclass to gen. Status

Let's protect our earth



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
CN 028, Trenton, N.J. 08625
609 - 292 - 1250

JOHN J. TRELA, Ph.D.
ACTING DIRECTOR

JUL 16 1986

Mr. James Gigantino
Hazardous Waste Coordinator
Alcan Powders and Pigments
Box 290
Elizabeth, N.J. 07207

Dear Mr. Gigantino:

RE: Alcan Powders and Pigments, Union, N.J., NJD 065 815 771

The Bureau of Hazardous Waste Engineering (The Bureau) has reviewed the documents submitted by you along with your request to be delisted from a Treatment, Storage and Disposal Facility (TSDF) status to Generator accumulating hazardous wastes for 90 days or less. The Bureau has determined that you meet the requirements of N.J.A.C. 7:26-9.3 et. al. which exempt those facilities who store hazardous wastes for 90 days or less from the full regulations that apply to TSD Facilities.

Based on the submitted information, the facility is exempt for storage of hazardous waste for less than 90 days in the tanks identified as No. 3 and No. 4 in Drawing No. 2396 submitted by Alcan on May 20, 1986 and for storage of containers in the designated area contingent upon compliance with the following:

1. The hazardous waste storage tanks must be 99% emptied every 90 days or less. Containers must be shipped out every 90 days or less from the starting accumulation date. All the wastes removed from the tanks and the containers shall be shipped off-site to an authorized facility.
2. The storage tank shell thickness shall be maintained at 1/4 inch and periodic inspections of the shell are required to verify its integrity. Only containers meeting the standards of N.J.A.C. 7:26-7.2 shall be used and they shall be managed in accordance with N.J.A.C. 7:26-9.4(d).
3. The date upon which the accumulation begins shall be clearly marked on each container and visible for inspection. Records must be kept up to date showing the starting accumulation date for the hazardous waste tanks.

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4. Secondary containment volume shall be maintained to contain the volume of tank No. 4 and shall be kept free of cracks; the thickness of the base shall be maintained at 4 inches.
5. The facility shall remain in compliance with N.J.A.C. 7:26-9.6 and 9.7 concerning preparedness and prevention, contingency plans and emergency procedures as well as N.J.A.C. 7:26-9.4(g) concerning personnel training.
6. All accumulated precipitation shall be removed from the containment basin in a timely manner and handled as hazardous waste if contaminated. Any spills and leaks must be removed daily.

This determination is based expressly on the review of the aforementioned correspondence and no claims are made as to the extent and physical condition of the actual hazardous waste activities occurring at the site.

Alcan's hazardous facility is no longer included in the Department's list of existing facilities (N.J.A.C. 7:26-1.4 and 12.3) and therefore does not need to conform with the interim operating requirements of N.J.A.C. 7:26-9 et seq. for "existing facilities". It is the facility's responsibility to operate within the conditions mentioned above.

The issuance of this delisting letter by the Department does not indicate, or imply, and should not be construed as a waiver of any requirements pursuant to the New Jersey Water Pollution Control Act, N.J.S.A. 58:10A-1 et. seq. and regulations promulgated thereunder concerning the New Jersey Pollutant Discharge Elimination System, N.J.A.C. 7:14A-1 et. seq. If your facility is in any of the regulated categories identified in the above cited regulations, you are hereby directed to apply for any and all permits necessary within ninety (90) days to the Bureau of Ground Water Discharge Permits, CN 029, Trenton, N.J. 08625.

If you have any questions on these matters, please contact Geroge Mejia from my staff at (609) 984-4874.

Very truly yours,



Ernest J. Kuhlwein, Jr., Acting Chief
Bureau of Hazardous Waste Engineering

EP34/sg

c: Angel Chang, USEPA